

NON-PUBLIC?: N
ACCESSION #: 9509260078
LICENSEE EVENT REPORT (LER)

FACILITY NAME: SALEM GENERATING STATION UNIT 2 PAGE: 1 OF 5

DOCKET NUMBER: 05000311

TITLE: MISSED SURVEILLANCE - CHARCOAL ADSORBER TESTING
EXCEEDED
TECHNICAL SPECIFICATIONS SURVEILLANCE REQUIREMENT TIME
LIMIT
EVENT DATE: 08/22/95 LER #: 95-006-00 REPORT DATE: 09/21/95

OTHER FACILITIES INVOLVED: DOCKET NO: 05000

OPERATING MODE: 5 POWER LEVEL: 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR
SECTION:
50.73(a)(2)(i)

LICENSEE CONTACT FOR THIS LER:
NAME: Mr. Jerome Ranalli, Technical TELEPHONE: (609) 339-2068
Manager - Salem

COMPONENT FAILURE DESCRIPTION:
CAUSE: SYSTEM: COMPONENT: MANUFACTURER:
REPORTABLE NPRDS:

SUPPLEMENTAL REPORT EXPECTED: NO

ABSTRACT:

On 8/23/95 a charcoal adsorber sample for the Control Room Emergency Air Conditioning System (EACS) was removed after approximately 988 hours of operation. This exceeded Technical Specifications SURVEILLANCE REQUIREMENT 4.7.6.1.c of "after 720 hours" (including the 25% allowance per the Technical Specifications). The sample removed on 8/23/95 was analyzed and found to meet the testing acceptance criteria. The safety significance for this event was determined to be low. The apparent cause for this event was the utilization of an informal process to monitor the charcoal adsorber run time hours combined with personnel error.

This is reportable as a missed surveillance in accordance with 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's

Technical Specifications.

END OF ABSTRACT

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PLANT AND SYSTEM IDENTIFICATION

Westinghouse - Pressurized Water Reactor

Control Room Emergency Air Conditioning System (EACS) - Charcoal Adsorber Filter {VI/FLT}*

* Energy Industry Identification System (EIIS) codes and component function identifier codes appear in the text as {SS/CCC}.

IDENTIFICATION OF OCCURRENCE

The Salem Unit 2 Technical Specifications (TS) SURVEILLANCE REQUIREMENT (SR) 4.7.6.1.c requires the Control Room EACS charcoal adsorber (filter) to be tested after 720 hours of operation. On 8/22/95 it was identified that the charcoal adsorber sample was overdue. On 8/23/95 the sample was removed after approximately 988 hours of operation which exceeded the Technical Specifications limit (including the 25% allowance in TS).

CONDITIONS PRIOR TO OCCURRENCE

Mode 5, Reactor Power 0%

The Control Room EACS was placed in the recirculation mode in mid July due to concerns with meeting GDC 19 criteria, which was addressed in LER 272/95-017-00. In the recirculation mode the system flow is through the charcoal adsorber which led to the increased use of the adsorber.

DESCRIPTION OF OCCURRENCE

The control room charcoal adsorber for Salem Unit 2 had approximately 315 cumulative hours of operation (run time) as of July 15, 1995. On July 18, 1995 the Control Room EACS was placed in the recirculation mode due to concerns with GDC 19 as reported in LER 272/95-017-00. At this point, the rate at which run time accumulated for the charcoal adsorber increased significantly. On July 24, 1995 the Salem Operations Department and Radiation Protection Chemistry Support Group were informed by the Engineering Support Engineer of the run time for the charcoal adsorber. The Engineering Support Engineer subsequently departed for two weeks of military leave, returning on August 21, 1995. On August 22,

1995 the Engineering Support Engineer discovered that the surveillance had not been performed. At the time the sample was removed, there were approximately 988 hours of cumulative hours of operation for the charcoal adsorber.

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DESCRIPTION OF OCCURRENCE (cont'd)

At the end of July the Salem Unit 1 charcoal adsorber had approximately 180 more run time hours than the Unit 2 adsorber. The Unit 1 charcoal adsorber surveillance was performed on August 3, 1995 within the acceptable Technical Specifications surveillance time limit. However, no work orders were initiated for the Unit 2 filter surveillance.

The Unit 1 and 2 Control Room EACS were placed back in the normal mode of operation in late August 1995.

APPARENT CAUSE OF OCCURRENCE

The apparent cause of this event was the utilization of an informal process to monitor the charcoal adsorber run time hours combined with personnel error. The process did not require written notification and depended on verbal communication to schedule the surveillance. The guidance provided to the Engineering Support Engineer was to notify the Radiation Protection Chemistry Support Group when the surveillance was due. The Engineer used voice mail for this notification with no assurance the message was received, understood or acted upon. Contributing factors included:

- * Failure of the Operations Department to ensure monitoring of the run time hours on the charcoal adsorber was current and compared to the TS limits.
- * Failure of the Engineering Support Engineer to assure that his notification to the Radiation Protection Chemistry Support Group was received and appropriate action taken.
- * Lack of recognition within the Technical Department management of the responsibilities of the Engineering Support Engineer and providing qualified back up to Engineering Support Engineer.

PRIOR SIMILAR OCCURRENCES

There were no previous similar reportable occurrences of failure to perform adsorber testing. A review of LERs for the last six years for

both Salem units did identify numerous LERs which involved missed surveillances. Most of the missed surveillances involved communication problems, but did not involve an informal process such as with the charcoal adsorber.

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PRIOR SIMILAR OCCURRENCES (cont'd)

However, there were three LERs since 1989 that did contain corrective actions which had the potential to identify the informal process used for the charcoal adsorber surveillance. One of the corrective actions in LERs 311/89-015-00 and 272/90-007 was to perform a verification audit of the Unit 1 and Unit 2 Technical Specification Surveillances, ensuring all requirements will be performed. The focus of this audit was to ensure there were procedures or tasks in place to perform all surveillances. However, the audit did not focus on the scheduling of surveillances and in particular did not address the monitoring and scheduling of Conditional Surveillances.

The apparent cause in LER 311/94-005-00 was inadequate communication within Maintenance. This event did not involve the Engineering Support Engineer responsible for cyclic data monitoring and as such the corrective actions in that LER did not include the Engineering Support Engineer.

SAFETY SIGNIFICANCE

The purpose of the adsorber is to remove iodine from the environment inside the control room areas following a LOCA. The 720 hour time limit between samplings ensures the capability of the adsorber to perform this emergency function for the control room environment. A review of Regulatory Guide 1.52, ANSI Standards N509-1976 and N510-1975, and the Nuclear Air Cleaning Handbook indicate the 720 hour period is the 30 day period following a postulated LOCA (DBA). There is a 31 day period after the sample is taken for the sample analysis of the adsorber to be completed. Although the sample was removed after approximately 988 hours, the adsorber sample was tested within 31 days of reaching the 720 hour time limit. The results of the adsorber sample test was satisfactorily. Based on the successful adsorber sample test, the safety significance of this event was low.

CORRECTIVE ACTIONS

The responsibility for monitoring the cumulative hours of operation on the charcoal adsorber will be assigned to the Operations Department.

This will simplify the process, reduce the possibility of miscommunication, and provide the Operations Department with ready access to information concerning the hours of operation on the adsorber. The applicable Operations Department procedures will be revised to monitor and track the cumulative hours of operation for the Control Room EACS charcoal adsorber. This will be completed by October 15, 1995.

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CORRECTIVE ACTIONS (cont'd)

The Operations Department will review TS SURVEILLANCE REQUIREMENTS to ensure there are no other surveillances which depend on an informal or non-proceduralized scheduling process. This review will be completed by October 30, 1995. Procedure revisions, if required, will be completed by December 31, 1995.

The Engineering Support Engineer currently monitors numerous non-periodic and cyclic information for assuring scheduling of TS surveillances. This information is maintained in the Cyclic Data Log. The Cyclic Data Log maintenance process will be transferred from Engineering to the Operations Department to preclude the possibility of a similar repeat occurrence involving other cyclic data monitoring actions. This action will be completed by June 1, 1996.

The Engineering Support Engineer has been counseled concerning management expectations of personnel accountability and communication. Responsible Engineering (formally Technical) management have been made fully aware of and recognize the TS surveillance monitoring responsibilities of the Engineering Support Engineer. Additionally, until the Cyclic Data log maintenance process is transferred from Engineering to the Operations Department, a backup engineer will be trained by October 1, 1995 in the actions required to fulfill these responsibilities.

An action request has been issued to evaluate the effectiveness of past corrective actions in light of recent problems with scheduling of TS surveillances. This action request was processed in accordance with the requirements of NC.NA-AP.ZZ-0006(Q), Corrective Action Program.

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